Recreational Fishing Alliance – South Carolina
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Comprehensive Ecosystem-based Amendment 2
Comments

The Recreational Fishing Alliance (RFA) is a national, 501(c)(4) non-profit grassroots political action organization that has been representing individual sport fishermen and the sport fishing industry since 1996. The RFA Mission is to safeguard the rights of saltwater anglers, protect marine, boat and tackle industry jobs and ensure the long-term sustainability of U.S. saltwater fisheries. RFA members include individual anglers, boat builders, fishing tackle manufacturers, party and charter boat businesses, bait and tackle retailers, marinas, and many other businesses in fishing communities. The South Carolina Chapter of RFA was created like all chapters of RFA, to build more local support and awareness of the RFA Mission.

Action 4: Modify Management of South Carolina's Special Management Zones (SMZ's)
Position: We support Alternatives 2 and 3, to limit harvest of CMP and snapper grouper species in SMZ's to recreational bag limits. The large majority of these reefs were built with revenues from state recreational saltwater licenses, and restricting harvest of fish in these areas to the recreational bag limits is absolutely logical. However, we oppose Alternative 4 which would prohibit the use of hand spears and spear guns in South Carolina SMZ's. These recreational activities comprise only a small portion of the hundreds of thousands of trips by recreational anglers to these areas annually. The biological impact of banning these activities in the SMZ's would be negligible at best while impact on a specific group and a few gear outfitters/suppliers would be substantial. Furthermore, there is no documentation or studies showing any need to restrict these activities in any matter. Diving and spearfishing in these areas has considerable socio-economic value in the recreational community that we believe outweighs any speculated biological impacts of prohibition in the SMZ's.

Action 5. Modify Sea Turtle Release Gear Requirements for the Snapper Grouper Fishery
Position: We support Alternative 7. Modify the design specifications of the current sea turtle release gear requirements for all federally permitted snapper grouper vessels with hook and line gear on board to match the specifications described in the NOAA Fisheries Service document entitled "Careful Release Protocols for Sea Turtle Release with Minimal Injury." Current sea turtle release gear requirements for for-hire recreational boats lack common sense as they have no relation to size or types of fishing gear being used aboard the vessels or the vessels' freeboard heights. The current requirements are therefore arbitrary and place undue burdens on for-hire vessel owners/operators.